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September 19, 2022

VIA ECF

Hon. Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 618
New York, New York 10007

MEMO ENDORSED

Re: *Gillett, et al. v. Zara USA, Inc., et al.*; Case No. 1:20-cv-3734-KPF

Dear Judge Failla,

We are counsel for Defendants Zara USA, Inc. and Inditex USA LLC, (collectively “Defendants”) in the above-referenced action. We write, jointly with Plaintiff, to update the Court that: (1) Defendants have filed their answer to the Amended Class Action Complaint (*see* Dkt. 74); (2) the parties have agreed upon and finalized the proposed notices to the putative collective members in regular mail, email, and text formats; and (3) Defendants have provided Plaintiff with a spreadsheet of all of the required information of the putative collective members, with the exception of telephone numbers, which will be supplemented to Plaintiff’s counsel tomorrow (September 20). The parties will then move forward with contacting the third party administrator to facilitate the distribution of the notices to the putative collective.

Accordingly, the parties respectfully request an extension of time of five business days through **September 27, 2022** to jointly file a proposed case management plan (“CMP”) and to provide the Court with another update. This is the parties’ first request for an extension of time to file the CMP. The reason for this extension request is because the parties are still negotiating the CMP and need time to meet and confer and finalize the CMP before filing it with the Court.

We appreciate Your Honor’s consideration of the parties’ joint request.

Sincerely,

/s/ Kevin K. Yam

Kevin K. Yam

Cc: All Counsel of Record (Via ECF)

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket entry 75.

Dated: September 20, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE